

EXHIBIT E

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.,) 3:17-cv-00939-WHA
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
Defendants.)
_____)

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VIDEOTAPED DEPOSITION OF SCOTT BOEHMKE

San Francisco, California

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Volume I

Reported by:

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Job No. 2596382

PAGES 1 - 79

Page 1

1 A So the proposal was to build a sensor that
2 had [REDACTED]

3 [REDACTED]. And the requirement
4 in B was to try to maintain those.

5 If you look at B, [REDACTED]
6 [REDACTED] whereas A, I had
7 liberty to put [REDACTED]
8 [REDACTED]

9 Q Okay. And so you came up with what's here
10 in number -- letter A based on Mr. Levandowski's 02:47:09
11 asking you to prepare this, right?

12 A I adapted the previous work I had done on
13 [REDACTED] to fit the capabilities that
14 they had.

15 Q So he was pointing you in one particular 02:47:28
16 direction, which was [REDACTED]
17 [REDACTED]
18 [REDACTED], right?

19 A [REDACTED] had been agreed upon, and
20 they were looking for a candidate configuration. 02:47:47
21 Yes, I made this configuration.

22 Q When you said "had been agreed upon,"
23 between yourself and Mr. Levandowski; that's what
24 you're referring to?

25 A No, this would have been with -- with 02:48:24

1 A Yes.

2 Q Okay. It's an email that you received in
3 December of 20- -- excuse me, October 2016, right?

4 A Yes.

5 Q [REDACTED] 02:52:55

6 THE WITNESS: We're -- we're closed book
7 here, right?

8 MR. KIM: Do you have a privilege issue --

9 THE WITNESS: Yeah.

10 MR. KIM: -- that you want to talk about? 02:53:13

11 THE WITNESS: Yeah, I need to understand.

12 BY MR. JAFFE:

13 Q If it's confidentiality issues, we're under
14 the protective order here. The only thing we can
15 break for is attorney-client issues. 02:53:21

16 A No. [REDACTED]

17 Q And what is [REDACTED]?

18 A [REDACTED]

19 [REDACTED]

20 Q I see. So the first email in this chain 02:53:35
21 from Mr. Haslim is talking about transitioning to
22 V2, which is Fuji, right?

23 A Yes.

24 Q And it's saying:

25 [REDACTED] [REDACTED] 02:53:52

1 actually showing how the PCBs would be laid out?

2 A Potentially, yes, yeah.

3 Q And did you talk to your colleagues about
4 this?

5 A Yes. 03:30:28

6 Q Okay. What did you tell them?

7 A Mr. Gasbarro and I started mocking this up.

8 Q And have you referenced that in your
9 declaration?

10 A In the declaration, no. 03:30:39

11 Q Are you aware of any documents attached to
12 your declaration that show that what's described
13 here as [REDACTED] actually
14 corresponds to a design for PCBs?

15 A No, I didn't provide further documents. I 03:30:56
16 was explaining that's what we were doing.

17 Q Sitting here today, are you aware of any
18 evidence that what's described here on page 51 of
19 your declaration actually corresponds to a design
20 for multiple PCBs on a single diode as opposed to 03:31:10
21 just a conceptual drawing?

22 A Multiple diodes on a single PCB?

23 Q Yes. Thank you.

24 A Yes, there is a layout with multiple diodes
25 on a single PCB. 03:31:24